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7 Dreamdealers USA, LLC d/b/a Exotics Racing,
8 David Perisset, and Roman Thievin

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 EDWARD B. DOUGLAS, an individual,
12
13 Plaintiffs,

14 vs.

15 DREAMDEALERS USA, LLC d/b/a
16 EXOTICS RACING, A Nevada limited
liability company, DAVID PERISSET, an
individual, and ROMAN THIEVIN, an
individual,

17 Defendant.
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Case No. 2:17-cv-02134-APG-PAL

**STIPULATION AND ORDER
TO EXTEND THE DEADLINE TO FILE
AN OPPOSITION TO MOTIONS FOR
SUMMARY JUDGMENT
(FIRST REQUEST)**

19 Plaintiff EDWARD B. DOUGLAS ("Plaintiff") and Defendants DREAMDEALERS USA,
20 LLC D/B/A EXOTICS RACING, DAVID PERISSET, AND ROMAN THIEVIN ("Defendants"),
21 by and through their undersigned counsel, hereby agree and stipulate to extend the time for
22 Plaintiff to file an opposition to Defendants' Motion for Summary Judgment (ECF No. 31) and for
23 Defendants to file an opposition to Plaintiff's Motion for Summary Judgment (ECF No. 32) from
24 the current deadline of December 6, 2018 up to and including **December 20, 2018**. The parties'
25 respective motions for summary judgment were filed on November 15, 2018. Such an extension is
26 necessary in order for the parties to prepare a proper response given intervening holidays and to
27 accommodate the parties' attempt to engage in possible settlement negotiations.
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1 This is the first request for an extension of time to file an opposition to the parties' respective
2 motions for summary judgment. This request is made in good faith and not for the purpose of delay.

3 Dated: December 5, 2018

Dated: December 5, 2018

4 Respectfully submitted,

Respectfully submitted,

5
6 /s/ Dustin L. Clark

/s/ Marcus B. Smith

7 DUSTIN L. CLARK, ESQ.
CLARK LAW COUNSEL PLLC

WENDY M. KRINCEK, ESQ.
MARCUS B. SMITH, ESQ.
LITTLER MENDELSON, P.C.

8 Attorney for Plaintiff

Attorneys for Defendants

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10 **ORDER**

11 **IT IS SO ORDERED.**

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16 UNITED STATES DISTRICT JUDGE

Dated: December 6, 2018.

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